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March 6, 2023

The Honorable Dennis Montali United States Bankruptcy Court 450 Golden Gate Ave., Courtroom 17 Mail Box 36099 San Francisco, CA 94102

Re: Case No. 19-30088

Docket #13518

## PLEASE POST TO COURTROOM DOCKET

## Dear Judge Montali:

This law firm's business and assets were damaged or destroyed by the Tubbs Fire. It is a claimant in the PG&E bankruptcy case and related settlement administered by the Fire Victim Trust (FVT). I write to express support for **Motion For Order Deeming William B. Abrams Supplement to Damage Claims Timely**. This motion seeks to apply to all claimants in the PG&E bankruptcy case, among others, the same holdings that allowed a hedge fund investor and other stockholders of PG&E to seek additional damages from the PG&E debtors ("<u>Debtors</u>").

This motion is being put forward in response to the direction set by this Court through its Order Granting Stipulation Resolving Motion of Baupost Group Securities, L.L.C.'s Supplement to Its Proofs of Rescissions or Damages Claims Timely (the "Baupost Motion"). Baupost's Motion asserted that the Debtors' stock valuation was "artificially inflated because of the Debtors' material misstatements and nondisclosures concerning their safety practice" and that Baupost "later suffered significant losses when the value of those securities fell as the falsity of Debtors' earlier misstatements came to light...." Baupost sought additional damages from the Debtors.

Similarly, a successful class action against the Debtors was filed in February 16, 2021 in United States District Court, Case 4:19-cv-06996-HSG, Document 81 (the "Class Action"), in which the Debtors agreed to pay \$10,000,000 in a settlement to resolve additional damages pursuant to claims that the Debtors and certain related parties violated Section 10(b) of the Securities Exchange Act by making material misrepresentations and omissions to the public.

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The Baupost Motion and the Class Action asserted additional damages against the Debtors <u>after</u> resolution of the PG&E bankruptcy case and <u>after</u> the formation of FVT.

As you know, FVT was funded in large part through shares of PG&E stock, which means that the valuation of the shares contributed to FVT for the benefit of claimants, like this law firm, has also been adversely impacted by the same material misrepresentations and omissions.

This law firm respectfully request that all claimants in the PG&E bankruptcy case and related settlement administered by FVT be granted the same rights to file subsequent claims against the Debtors, as were Baupost Group Securities, L.L.C. and the stockholders in the Class Action.

Sincerely yours,

IDEAL COUNSEL, A PROFESSIONAL LAW CORPORATION

By: Jason Meek, CEO

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